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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 23-00130 JD
)	
Plaintiff,)	STIPULATION TO CONTINUE CHANGES OF
)	PLEA AND EXCLUDE TIME FROM NOVEMBER
v.)	4, 2024, TO JANUARY 6, 2025, AND [PROPOSED]
)	ORDER
SEVERO PINEDA and FRANCISCO JAVIER)	
SOLORIODUARTE,)	
)	
Defendants.)	

Counsel for defendants Severo Pineda and Francisco Javier Solorioduarte and the United States jointly request that the defendants' changes of plea currently scheduled for November 4, 2024, be continued until January 6, 2025. The reason for the request is that defense counsel require additional time to review discovery and the government's plea offers with their clients with the assistance of Spanish language interpreters.

It is therefore stipulated by and between counsel for the United States and counsel for defendants Severo Pineda and Francisco Javier Solorioduarte that time be excluded under the Speedy Trial Act from November 4, 2024, through January 6, 2025. The government and counsel for the defendants agree that time be excluded under the Speedy Trial Act so that defense counsel can continue to prepare,

STIPULATION AND ~~[PROPOSED]~~ ORDER
Case No. CR 23-00130 JD

1 including by reviewing discovery produced by the government. The parties therefore stipulate and agree
2 that excluding time until January 6, 2025, will allow for the effective preparation of counsel. *See* 18
3 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by
4 excluding the time from November 4, 2024, through January 6, 2025, from computation under the
5 Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C.
6 § 3161(h)(7)(A), (B)(iv).

7 The undersigned Assistant United States Attorney certifies that he has obtained approval from
8 counsel for the defendants to file this stipulation and proposed order.

9 IT IS SO STIPULATED.

10
11 DATED: October 31, 2024

/s/

DAN M. KARMEL
Assistant United States Attorney

12
13 DATED: October 31, 2024

/s/

K. ALEXANDRA MCCLURE
Counsel for Defendant PINEDA

14
15
16 DATED: October 31, 2024

/s/

RICHARD TAMOR
Counsel for Defendant SOLORIODUARTE

17
18 ~~PROPOSED~~ ORDER

19 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court
20 hereby continues the changes of plea in the above-captioned matter from November 4, 2024, to January
21 27, 2025, and finds that failing to exclude the time from November 4, 2024, through January 27, 2025,
22 would unreasonably deny defense counsel and the defendants the reasonable time necessary for effective
23 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court
24 further finds the ends of justice served by excluding the time from November 4, 2024, to January 27,
25 2025, from computation under the Speedy Trial Act outweigh the best interests of the public and the
26 defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time from November 4,
27 2024, through January 27, 2025, shall be excluded from computation under the Speedy Trial
28

1 Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

2 IT IS SO ORDERED.

3
4 DATED: November 1, 2024


HON. JAMES DONATO
United States District Judge